



Office of the Secretary of State  
**ilsos.gov**

# Business Entity Search

## Entity Information

**Entity Name** AMERICAN PUBLIC DEFENSE INC.

**File Number** 69304079 **Status** NOT GOOD STANDING

**Entity Type** CORPORATION **Type of Corp** DOMESTIC BCA

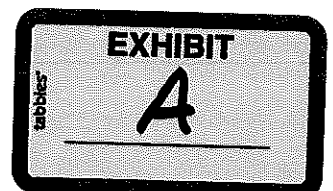
**Incorporation Date (Domestic)** 11-26-2013 **State** ILLINOIS

**Duration Date** PERPETUAL

**Annual Report Filing Date** 00-00-0000 **Annual Report Year** 2023

**Agent Information** LEWIS BROWN  
 3430 FLOSSMOOR RD  
 FLOSSMOOR ,IL 60422-2200 **Agent Change Date** 11-26-2013

Services and More Information



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

SUMMONS IN A CIVIL CASE

DIANE SHEARS

V.

AMERICAN PUBLIC DEFENSE, INC.,  
and LEWIS BROWN

CASE NUMBER: 1:22-cv-2099

ASSIGNED JUDGE: Hon. Elaine E. Bucklo

DESIGNATED  
MAGISTRATE JUDGE: Hon. Jeffrey Cole

TO: (Name and address of Defendant)

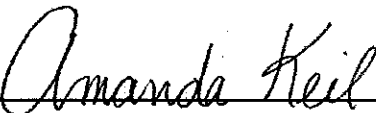
LEWIS BROWN  
277 Somonauk Street  
Park Forest, Illinois 60466

**YOU ARE HEREBY SUMMONED** and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

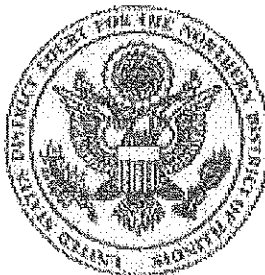
Josh Sanford  
SANFORD LAW FIRM, PLLC  
10800 Financial Centre Parkway, Suite 510  
Little Rock, Arkansas 72211  
501-221-0088; josh@sanfordlawfirm.com

an answer to the complaint which is herewith served upon you, 21 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

THOMAS G. BRUTON, CLERK

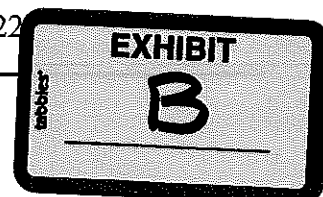


(By) DEPUTY CLERK



April 22, 2022

DATE



## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

**DIANE SHEARS**

Plaintiff/Petitioner

vs.

**AMERICAN PUBLIC DEFENSE, INC.; LEWIS BROWN**

Defendant/Respondent

Case No.: **1:22-CV-2099**AFFIDAVIT OF SERVICE OF  
**SUMMONS; ORIGINAL COMPLAINT**I, **Ray Wimbley**, depose and say the following:

I certify that I am over the age of eighteen. I am not a party to the above action. I am a registered private detective or a registered employee of a private detective agency, License No. 115002322, located at P O Box 129, Richton Park, IL 60471.

On the **4th day of May, 2022 at 4:57 PM**, I, **Ray Wimbley**, **SERVED Lewis Brown at 277 Somonauk Street, Park Forest, Cook County, IL 60466** in the manner indicated below:

**SUBSTITUTE SERVICE**, by personally leaving 1 copy(ies) of the above-listed documents at his/her usual place of abode with **John Doe**, who is 13 years of age or older, a person residing therein of who confirmed the Defendant resides at the above address and informed that person of the contents thereof.

On 05/05/2022 a copy was mailed in a sealed envelope with postage fully prepaid, addressed to **Lewis Brown** at his/her usual place of abode.

THE DESCRIPTION OF THE PERSON WITH WHOM THE COPY OF THIS PROCESS WAS LEFT IS AS FOLLOWS:  
I delivered the documents to an individual who refused to give their name who indicated they were the subject's son, co-resident. The individual accepted service with direct delivery. The individual appeared to be a black-haired black male contact 18-25 years of age, 5'6"-5'8" tall and weighing 120-140 lbs.

Service Fee Total: **\$64.00**

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this Affidavit of Service are true and correct.

NAME:

*Ray C Wimbley*

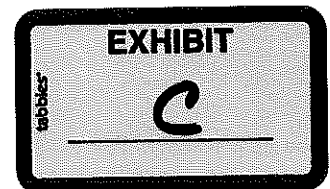
115002322

05/05/2022

Ray Wimbley

Server ID #

Date



**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

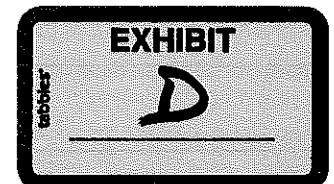
|                         |   |                     |
|-------------------------|---|---------------------|
| DIANE SHEARS,           | ) |                     |
|                         | ) |                     |
| Plaintiffs,             | ) |                     |
| v.                      | ) | Case No. 22-cv-2099 |
|                         | ) |                     |
| AMERICAN PUBLIC DEFENSE | ) | Judge LaShonda Hunt |
|                         | ) |                     |
| Defendants.             | ) |                     |

**DECLARATION OF LEWIS BROWN**

LEWIS BROWN, states the following under penalty of perjury pursuant to 28 U.S.C.

Section 1746:

1. I am Lewis Brown, a Defendant in this action. I am competent to execute this Declaration.
2. While a United States citizen, I have resided in a foreign country since 2021.
3. The return of service on me filed with the Court claims service upon a member of a household on May 4, 2022 at an address of 277 Somonauk Street, Park Forest, Illinois. That address is a single family house. The address is a rental property in which I was a tenant until December 2019. I moved out of the premises in December 2019 and have never returned. I did not reside at 277 Somonauk Street, Park Forest, Illinois on May 4, 2022 and have no knowledge on who did reside on the premises on May 4, 2022.
4. On May 4, 2022 I was a resident of a foreign country. The only Illinois residence I maintained at all at the time was 15400 Crockett Lane, Markham Illinois. Attached hereto as Exhibit A are billings for April 2022 and May 2022 from the City of Markham to me for water and sewer service at the Crockett Lane address.



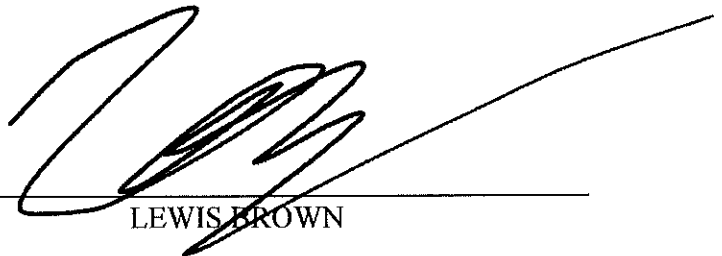
5. The return of service on me filed with the Court claims service upon a member of a household who “indicated” that he was my “son” and a “co-resident” at 277 Somonauk Street, Park Forest, Illinois. The man is described as a black male 18-25 years of age. Not only did I not reside at 277 Somonauk Street, Park Forest, Illinois on May 4, 2022, but I was only 31 years old on that date, and I have never had children. I have no knowledge of the person described in the return, other than the person is no relative of mine or a member of my household.

6. I did not become aware of the existence of this lawsuit, or the judgment, until December 2023, when I was seeking a loan. The judgment was on my credit report and I was accordingly informed of the lawsuit and judgment. I had no prior knowledge of the existence of the lawsuit.

FURTHER DECLARANT SAYETH NAUGHT.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February <sup>29</sup>\_\_\_\_, 2024.



LEWIS BROWN

Anthony J. Peraica - ARDC No. 6186661  
ANTHONY J. PERAICA & ASSOCIATES, LTD.  
5130 S. Archer Avenue  
Chicago, Illinois 60632  
773-735-1700



**CITY OF MARKHAM**  
 16313 S. Kedzie Parkway  
 Markham, IL 60428  
 708-331-4905  
 www.cityofmarkham.net

## WATER/ SEWER/ REFUSE BILL

| SERVICE ADDRESS   | ACCOUNT NUMBER |
|-------------------|----------------|
| 15400 CROCKETT LN | 31-4011-90001  |

Total Due On or Before: 04/05/2022 \$ 194.60  
 Total Due After: 04/05/2022 \$ 203.47

LEWIS BROWN  
 15400 CROCKETT LN  
 MARKHAM IL 60428



AMOUNT ENCLOSED

PLEASE INCLUDE YOUR ACCOUNT NUMBER ON YOUR CHECK  
 MAKE CHECKS PAYABLE TO: CITY OF MARKHAM WATER DEPARTMENT  
 Return this top portion with your payment.

Retain this portion for your records.

## WATER/ SEWER/ REFUSE BILL

| ACCOUNT NUMBER | SERVICE ADDRESS   | BILL DATE  |
|----------------|-------------------|------------|
| 31-4011-90001  | 15400 CROCKETT LN | 03/18/2022 |

### BILLING PERIOD

Current Reading Date: 03/07/2022  
 Previous Reading Date: 02/04/2022

### METER INFORMATION

Current Reading: 583  
 Previous Reading: 575  
 Usage per 1,000 Gallons: 8,000

### CURRENT CHARGES

WATER \$ 88.65  
 SEWER \$ 5.00  
 GARBAGE \$ 25.81

Total Current Charges 119.46

### PREVIOUS BALANCE

\$ 75.14

Total Due on or Before: 04/05/2022 \$ 194.60  
 Total Due After: 04/05/2022 \$ 203.47

WATER DISCONNECTION NOTICES WILL NO LONGER BE ISSUED. WATER WILL BE DISCONNECTED IF THE BALANCE IS NOT PAID IN FULL BEFORE 8:00AM APRIL 18, 2022. PAYING AFTER 8:00AM ON APRIL 18TH MAY LEAD TO DISCONNECTION. IF DISCONNECTED YOU WILL INCUR A \$75.00 RESTORE FEE. PERSONAL CHECKS WILL NOT BE ACCEPTED TO RESTORE SERVICE. A LATE PENALTY WILL BE ADDED TO CURRENT CHARGES IF PAYMENT IN FULL IS NOT RECEIVED BY 5:00PM ON APRIL 05, 2022. A FEE OF 2.75% (MIN. OF \$ 2.00) WILL BE CHARGED FOR ALL CREDIT/DEBIT CARD PAYMENTS MADE AT THE FRONT WINDOW. ONLINE & PHONE PAYMENT FEES ARE 3%.

WE NOW HAVE A NEW ONLINE PAYMENT SYSTEM. PLEASE GO TO [www.cityofmarkham.net/EPayment](http://www.cityofmarkham.net/EPayment) AND HIT THE "PAY BILLS" ICON TO BE TAKEN TO OUR NEW PAYMENT SITE WITH INVOICE CLOUD. THIS IS A DIFFERENT SITE SO YOU WILL NEED TO REREGISTER YOUR ACCOUNT. THERE IS NO LONGER A ZERO BEFORE THE ACCOUNT NUMBER AND DO NOT INCLUDE THE DASHES. FOR THE NAME PUT IN EITHER THE FIRST OR LAST NAME ON THE ACCOUNT. FOR BUSINESSES OR LLCs TYPE IN THE FIRST FEW LETTERS OF THE NAME ON THE ACCOUNT. IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT THE WATER DEPT. AT 708-331-4905 EXT. 306.

YOU CAN ALSO PAY BY PHONE. CALL 855-786-5341

Office Hours: Monday – Friday 9:00am-5:00pm.  
 24hr Payment Drop Box Located in Parking Lot near Water Tower.



**CITY OF MARKHAM**

16313 S. Kedzie Parkway  
Markham, IL 60428  
708-331-4905  
www.cityofmarkham.net

**WATER/ SEWER/ REFUSE BILL**

| SERVICE ADDRESS   | ACCOUNT NUMBER |
|-------------------|----------------|
| 15400 CROCKETT LN | 31-4011-90001  |

Total Due On or Before: 05/05/2022 \$ 300.77  
Total Due After: 05/05/2022 \$ 307.42

LEWIS BROWN  
15400 CROCKETT LN  
MARKHAM IL 60428

**AMOUNT ENCLOSED**

PLEASE INCLUDE YOUR ACCOUNT NUMBER ON YOUR CHECK  
MAKE CHECKS PAYABLE TO: CITY OF MARKHAM WATER DEPARTMENT  
Return this top portion with your payment.

Retain this portion for your records.

**WATER/ SEWER/ REFUSE BILL**

| ACCOUNT NUMBER | SERVICE ADDRESS   | BILL DATE  |
|----------------|-------------------|------------|
| 31-4011-90001  | 15400 CROCKETT LN | 04/19/2022 |

**BILLING PERIOD**

Current Reading Date: 04/05/2022  
Previous Reading Date: 03/07/2022

**METER INFORMATION**

Current Reading: 589  
Previous Reading: 583  
Usage per 1,000 Gallons: 6,000

**CURRENT CHARGES**

WATER \$ 66.49  
SEWER \$ 5.00  
GARBAGE \$ 25.81

Total Current Charges 97.30

**PREVIOUS BALANCE**

\$ 203.47

Total Due on or Before: 05/05/2022 \$ 300.77  
Total Due After: 05/05/2022 \$ 307.42

WATER DISCONNECTION NOTICES WILL NO LONGER BE ISSUED. WATER WILL BE DISCONNECTED IF THE BALANCE IS NOT PAID IN FULL BEFORE 8:00AM MAY 16, 2022. PAYING AFTER 8:00AM ON MAY 16TH MAY LEAD TO DISCONNECTION. IF DISCONNECTED YOU WILL INCUR A \$75.00 RESTORE FEE. PERSONAL CHECKS WILL NOT BE ACCEPTED TO RESTORE SERVICE. A LATE PENALTY WILL BE ADDED TO CURRENT CHARGES IF PAYMENT IN FULL IS NOT RECEIVED BY 5:00PM ON MAY 05, 2022. A FEE OF 2.75% (MIN. OF \$ 2.00) WILL BE CHARGED FOR ALL CREDIT/DEBIT CARD PAYMENTS MADE AT THE FRONT WINDOW. ONLINE & PHONE PAYMENT FEES ARE 3%.

WE NOW HAVE A NEW ONLINE PAYMENT SYSTEM. PLEASE GO TO [www.cityofmarkham.net/EPayment](http://www.cityofmarkham.net/EPayment) & HIT THE "PAY BILLS" ICON TO BE TAKEN TO OUR NEW PAYMENT SITE WITH INVOICE CLOUD. THIS IS A DIFFERENT SITE SO YOU WILL NEED TO REREGISTER YOUR ACCOUNT. THERE IS NO LONGER A ZERO BEFORE THE ACCOUNT NUMBER AND DO NOT INCLUDE THE DASHES. FOR THE NAME PUT IN EITHER THE FIRST OR LAST NAME ON THE ACCOUNT. FOR BUSINESSES OR LLCs TYPE IN THE FIRST FEW LETTERS OF THE NAME ON THE ACCOUNT. CALL 855-786-5341 TO PAY BY PHONE. IF YOU HAVE ANY QUESTIONS, PLEASE CONTACT THE WATER DEPT. AT 708-331-4905 EXT. 306.

PLEASE SEE OTHER SIDE FOR SPRING CLEAN UP WEEK INFORMATION.

Office Hours: Monday – Friday 9:00am-5:00pm.  
24hr Payment Drop Box Located In Parking Lot near Water Tower.



Doc#: 1525818056 Fee: \$76.00  
RHSP Fee: \$9.00 RPRF Fee: \$1.00  
Karen A. Yarbrough  
Cook County Recorder of Deeds  
Date: 09/15/2016 01:44 PM Pg: 1 of 12

**This Instrument Prepared by:**  
Timothy P. McHugh, LTD  
Attorney  
360 W. Butterfield #300  
Elmhurst, IL 60126

**WHEN  
RECORDED RETURN TO:**

OS National, LLC  
2170 Satellite Boulevard, Ste. 450  
Duluth, GA 30097

(Above Space for Recorder's use only)

**WARRANTY DEED**

THE GRANTOR, BLTREJV3 Chicago LLC, a Delaware limited liability company, whose address is c/o Building and Land Technology, 2200 Atlantic Street, Stamford, CT 06902, for and in consideration of TEN AND 00/100 DOLLARS, and other good and valuable consideration in hand paid, REMISE, RELEASE, ALIEN and CONVEY to CSMA BLT, LLC, a Delaware limited liability company, whose address is c/o Cerberus Capital Management, L.P. 875 Third Avenue, 12<sup>th</sup> Floor, New York, New York 10022, all interest in the real estate legally described on Exhibit A attached hereto and incorporated herein by this reference (the "Property");

Together with all and singular the hereditaments and appurtenances thereunto belonging, or in anywise appertaining, and the reversion and reversions, remainder and remainders, rents, issues and profits thereof, and all the estate, right, title, interest, claim or demand whatsoever, of the Grantor, either in law or equity, of, in and to the above described Property, with the hereditaments and appurtenances: TO HAVE AND TO HOLD the said Property as above described, with the appurtenances, unto the Grantee and its heirs, successors and assigns forever.

And the Grantor, for itself, and its successors, does covenant, promise and agree, to and with the Grantee, its heirs, successors and assigns, that it has not done or suffered to be done, anything whereby the said Property hereby granted are, or may be, in any manner encumbered or charged, except as herein recited; and that the said Property, against all persons lawfully claiming, or to claim the same, by, through or under it, it WILL WARRANT AND DEFEND, subject to: (i) all matters of record; (ii) any and all matters which would be disclosed on a current survey or physical inspection of the Property; (iii) all taxes not yet due and payable; (iv) all building and zoning ordinances, laws, regulations and restrictions by municipal or other governmental authority, and (v) rights of tenants in possession, as tenants only, under unrecorded residential leases as shown on the rent roll delivered by Grantor to Grantee contemporaneous with the recording of this deed.



Cook Park Forest 2

CCFD REVIEWER



herewith (collectively, the "**Permitted Encumbrances**"); however, reference herein to the Permitted Encumbrances shall not be deemed to reimpose same.

Hereby releasing and waiving all rights under and by virtue of the Homestead Exemption Laws of the State of Illinois.


Part of PINS: See **Exhibit A**, attached hereto and incorporated herein.


ADDRESS: See **Exhibit A**, attached hereto and incorporated herein.

Send future real estate tax bills to the Grantee at its address set forth above.

*[signature page follows]*

*[remainder of this page intentionally left blank]*

|   |              |                                     |
|---|--------------|-------------------------------------|
| STATE TAX<br><br>SEP. 11. 15<br>REAL ESTATE TRANSFER TAX<br>DEPARTMENT OF REVENUE | # 0000025120 | <b>REAL ESTATE<br/>TRANSFER TAX</b> |
|   |              | 00533.00                            |
|   |              | FP 103037                           |

|   |              |                                     |
|---|--------------|-------------------------------------|
| COUNTY TAX<br><b>COOK COUNTY</b><br><b>REAL ESTATE TRANSACTION TAX</b><br><br>SEP. 11. 15<br>REVENUE STAMP | # 0000025067 | <b>REAL ESTATE<br/>TRANSFER TAX</b> |
|   |              | 00266.50                            |
|   |              | FP 103042                           |

IN WITNESS WHEREOF, Grantor has executed this Warranty Deed as of the 28<sup>th</sup> day of July, 2015.

**GRANTOR:**

**BLTREJV3 Chicago LLC**, a Delaware limited liability company

By: [Signature]

Name: Paul J. Kuehner

Title: Authorized Signatory

STATE OF Connecticut  
COUNTY OF Fairfield ) SS.

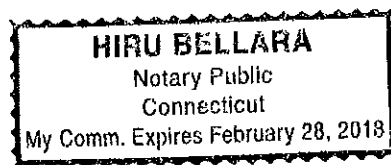
I, the undersigned, a Notary Public in and for said County, in the State aforesaid, do hereby certify that Paul J. Kuehner, Authorized Signatory for BLTREJV3 Chicago LLC, a Delaware limited liability company, personally known to be to be the same person whose name is subscribed to the foregoing instrument, and in such capacity, appeared before me this day in person and acknowledged that he/she signed and delivered said instrument as his/her own free and voluntary act, and as the free and voluntary act of said limited liability company, for the uses and purposes therein set forth.

GIVEN under my hand and Notarial seal this 28<sup>th</sup> day of July, 2015.

Hiru Bellara  
Notary Public

My Commission Expires:

2/28/2018  
[NOTARIAL SEAL]



No title search was performed on the subject property by the preparer. The preparer of this deed makes no representation as to the status of the title nor property use or any zoning regulations concerning described property herein conveyed nor any matter except the validity of the form of this instrument. Information herein was provided to preparer by Grantors/Grantees and /or their agents; no boundary survey was made at the time of this conveyance.

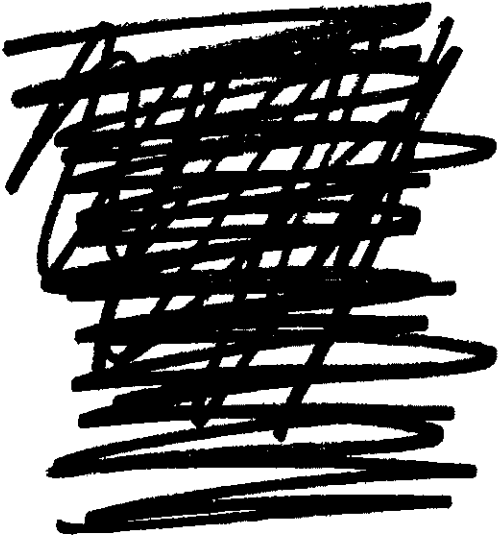
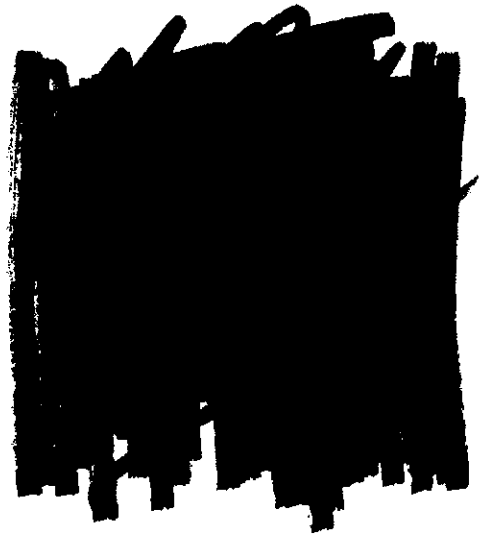


EXHIBIT A





## PROPERTY SCHEDULE

| Count | File Number | Address         | City        | State | Zip   | County |
|-------|-------------|-----------------|-------------|-------|-------|--------|
| 1     | BLT-75      | 208 LEE ST      | PARK FOREST | IL    | 60466 | COOK   |
| 2     | BLT-79      | 212 NASHUA      | PARK FOREST | IL    | 60466 | COOK   |
| 3     | BLT-84      | 220 MIAMI       | PARK FOREST | IL    | 60466 | COOK   |
| 4     | BLT-103     | 277 SOMONAUK ST | PARK FOREST | IL    | 60466 | COOK   |
| 5     | BLT-107     | 303 SHAWNEE ST  | PARK FOREST | IL    | 60466 | COOK   |
| 6     | BLT-109     | 304 SHAWNEE ST  | PARK FOREST | IL    | 60466 | COOK   |
| 7     | BLT-113     | 307 ORCHARD     | PARK FOREST | IL    | 60466 | COOK   |
| 8     | BLT-114     | 307 WINDSOR ST  | PARK FOREST | IL    | 60466 | COOK   |
| 9     | BLT-116     | 308 SHABBONA ST | PARK FOREST | IL    | 60466 | COOK   |

3/18/24 420dolls00cts

3/18/24 330dolls00cts

3/18/24 320dolls00cts

3/18/24 300dolls00cts

3/18/24 280dolls00cts

3/18/24 205dolls00cts

3/18/24 300dolls00cts

3/18/24 215dolls00cts

3/18/24 320dolls00cts



## LEGAL DESCRIPTIONS



**EXHIBIT A-1**

STREET ADDRESS: 208 LEE ST, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-75

TAX PARCEL ID/APN: 31-24-313-008-0000

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF COOK, STATE OF ILLINOIS, AND IS DESCRIBED AS FOLLOWS: LOT 14 IN BLOCK 29 IN LINCOLNWOOD CENTER, BEING A SUBDIVISION OF PART OF THE SOUTHEAST 1/4 AND PART OF THE SOUTHWEST 1/4 OF SECTION 24, TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO PLAT THEREOF RECORDED JUNE 26, 1958, AS DOCUMENT 17245364 AND FILED IN THE OFFICE OF THE REGISTRAR OF TITLES AS DOCUMENT LR1803326, IN COOK COUNTY, ILLINOIS.

\*\*\*

**EXHIBIT A-2**

STREET ADDRESS: 212 NASHUA, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-79

TAX PARCEL ID/APN: 31-35-416-030-0000

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF COOK, STATE OF ILLINOIS, AND IS DESCRIBED AS FOLLOWS: LOT 9 IN BLOCK 66 IN RE-SUBDIVISION OF BLOCKS 46 AND 65 IN VILLAGE OF PARK FOREST AREA NUMBER 5, BEING A SUBDIVISION OF PART OF THE EAST 1/2 OF SECTION 35 AND THE WEST 1/2 OF SECTION 36, TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO THE PLAT THEREOF RECORDED OF SAID RE-SUBDIVISION FILED FOR RECORD IN THE OFFICE OF THE RECORDER OF COOK COUNTY, ILLINOIS ON JULY 15, 1952 AS DOCUMENT NUMBER 15387755, IN COOK COUNTY, ILLINOIS.

\*\*\*

**EXHIBIT A-3**

STREET ADDRESS: 220 MIAMI, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-84

TAX PARCEL ID/APN: 31-36-312-016-0000

LOT 25 IN BLOCK 54 IN VILLAGE OF PARK FOREST AREA NO. 5, BEING A SUBDIVISION OF PART OF THE EAST 1/2 OF SECTION 35 AND THE WEST 1/2 OF SECTION 36, TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO THE PLAT THEREOF RECORDED AUGUST 3, 1951, AS DOCUMENT 15139014, IN COOK COUNTY, ILLINOIS.

\*\*\*

**EXHIBIT A-4**

STREET ADDRESS: 277 SOMONAUK ST, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-103

TAX PARCEL ID/APN: 31-35-420-006-0000

LOT 6 IN BLOCK 77 IN VILLAGE OF PARK FOREST AREA NO. 8, BEING A SUBDIVISION OF PART OF THE SOUTHEAST 1/4 OF SECTION 35, TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO THE PLAT THEREOF RECORDED IN THE RECORDER'S OFFICE OF COOK COUNTY, ILLINOIS ON SEPTEMBER 30, 1953, AS DOCUMENT 15733496, IN COOK COUNTY, ILLINOIS.

\*\*\*

**EXHIBIT A-5**

STREET ADDRESS: 303 SHAWNEE ST, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-107

TAX PARCEL ID/APN: 31-35-409-007-0000

LOT 14 IN BLOCK 80 IN VILLAGE OF PARK FOREST AREA NUMBER 8, BEING A SUBDIVISION OF PART OF THE SOUTHWEST 1/4 OF SECTION 35, TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO THE PLAT THEREOF RECORDED AS DOCUMENT NUMBER 15733496, IN COOK COUNTY, ILLINOIS.

\*\*\*

**EXHIBIT A-6**

STREET ADDRESS: 304 SHAWNEE ST, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-109

TAX PARCEL ID/APN: 31-35-408-027-0000

LOT 5 IN BLOCK 81 IN VILLAGE OF PARK FOREST AREA NUMBER 8, BEING A SUBDIVISION OF PART OF THE SOUTHEAST 1/4 OF SECTION 35, TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN ACCORDING TO THE PLAT THEREOF RECORDED SEPTEMBER 30, 1953 AS DOCUMENT NUMBER 15733496, IN COOK COUNTY, ILLINOIS.

\*\*\*

**EXHIBIT A-7**

STREET ADDRESS: 307 ORCHARD, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-113

TAX PARCEL ID/APN: 31-36-406-021-0000

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF COOK, STATE OF ILLINOIS, AND IS DESCRIBED AS FOLLOWS: LOT 36 IN BLOCK 22 IN VILLAGE OF PARK FOREST AREA NO. 3, BEING A SUBDIVISION IN SECTION 36, TOWNSHIP 35 NORTH, RANGE 13 EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO THE PLAT THEREOF RECORDED IN THE RECORDER'S OFFICE OF COOK COUNTY, ILLINOIS ON OCTOBER 31, 1950, AS DOCUMENT NUMBER 14940342, IN COOK COUNTY, ILLINOIS.

\*\*\*

**EXHIBIT A-8**

STREET ADDRESS: 307 WINDSOR ST, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-114

TAX PARCEL ID/APN: 31-35-201-008-0000

LOT 4 IN BLOCK 5 IN THE VILLAGE OF PARK FOREST WESTWOOD ADDITION, BEING A SUBDIVISION OF PART OF THE SOUTHEAST 1/4 OF SECTION 26, AND THAT PART OF THE NORTHEAST 1/4 OF SECTION 35, ALL IN TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

\*\*\*

**EXHIBIT A-9**

STREET ADDRESS: 308 SHABBONA ST, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-116

TAX PARCEL ID/APN: 31-35-212-066-0000

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF COOK, STATE OF ILLINOIS, AND IS DESCRIBED AS FOLLOWS: LOT 33 IN BLOCK 94 IN VILLAGE OF PARK FOREST AREA NUMBER 4, BEING A SUBDIVISION OF PART OF THE EAST 1/2 OF SECTION 35 AND THE WEST 1/2 OF SECTION 36, TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

\*\*\*

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**DIANE SHEARS**

**PLAINTIFF**

vs.

No. 1:22-cv-2099-EEB

**AMERICAN PUBLIC DEFENSE, INC.,  
and LEWIS BROWN**

**DEFENDANT**

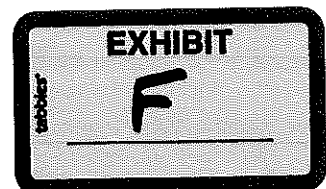
**NOTICE OF SERVICE OF COURT ORDER**

Plaintiff Diane Shears, by and through her attorney Josh Sanford of Sanford Law Firm, PLLC, and for her Notice of Service of Court Order, does hereby states as follows:

1. On July 24, this Court entered an Order setting a telephonic prove-up hearing on Plaintiff's Motion for Default Judgment as to individual Defendant Lewis Brown. *See* ECF No. 21.

2. The Court further ordered Plaintiff to serve defaulted defendant Lewis Brown with a copy of that Order by July 26.

3. Plaintiff hereby provides proof of such service by certified mail, receipt requested, sent to defaulted Defendant's last known address, attached hereto as Exhibit A.





Respectfully submitted,

**PLAINTIFF DIANE SHEARS**

SANFORD LAW FIRM, PLLC  
Kirkpatrick Plaza  
10800 Financial Centre Parkway, Suite 510  
Little Rock, Arkansas 72211  
Telephone: (501) 221-0088  
Facsimile: (888) 787-2040

Josh Sanford  
Ark. Bar No. 2001037  
[josh@sanfordlawfirm.com](mailto:josh@sanfordlawfirm.com)

U.S. Postal Service<sup>®</sup>  
**CERTIFIED MAIL<sup>®</sup> RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)<sup>®</sup>

Park Forest, IL 60466

**OFFICIAL USE**

Certified Mail Fee \$4.35

Extra Services & Fees (check box, add fee as appropriate)

|  |        |
|--|--------|
| <input type="checkbox"/> Return Receipt (hardcopy)           | \$0.00 |
| <input type="checkbox"/> Return Receipt (electronic)         | \$0.00 |
| <input type="checkbox"/> Certified Mail Restricted Delivery  | \$0.00 |
| <input type="checkbox"/> Adult Signature Required            | \$0.00 |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$0.00 |

Postage \$0.66

Total Postage and Fees \$8.56

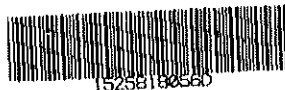
0895  
4

Postmark Here

07/26/2023

Sent To: Lewis Brown  
 Street and Apt. No. or PO Box No. 277 Somonauk Street  
 City, State, ZIP+4<sup>®</sup> Park Forest IL 60466

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions



Doc#: 1525818056 Fee: \$76.00  
RHSP Fee: \$9.00 RPRF Fee: \$1.00  
Karen A. Yarbrough  
Cook County Recorder of Deeds  
Date: 09/15/2016 01:44 PM Pg: 1 of 12

**This Instrument Prepared by:**

Timothy P. McHugh, LTD  
Attorney  
360 W. Butterfield #300  
Elmhurst, IL 60126

**WHEN**

**RECORDED RETURN TO:**

OS National, LLC  
2170 Satellite Boulevard, Ste. 450  
Duluth, GA 30097

(Above Space for Recorder's use only)

**WARRANTY DEED**

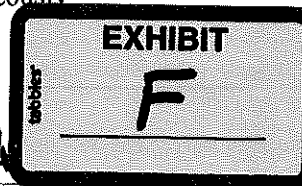
THE GRANTOR, BLTREJV3 Chicago LLC, a Delaware limited liability company, whose address is c/o Building and Land Technology, 2200 Atlantic Street, Stamford, CT 06902, for and in consideration of TEN AND 00/100 DOLLARS, and other good and valuable consideration in hand paid, REMISE, RELEASE, ALIEN and CONVEY to CSMA BLT, LLC, a Delaware limited liability company, whose address is c/o Cerberus Capital Management, L.P. 875 Third Avenue, 12<sup>th</sup> Floor, New York, New York 10022, all interest in the real estate legally described on Exhibit A attached hereto and incorporated herein by this reference (the "Property");

Together with all and singular the hereditaments and appurtenances thereunto belonging, or in anywise appertaining, and the reversion and reversions, remainder and remainders, rents, issues and profits thereof, and all the estate, right, title, interest, claim or demand whatsoever, of the Grantor, either in law or equity, of, in and to the above described Property, with the hereditaments and appurtenances: TO HAVE AND TO HOLD the said Property as above described, with the appurtenances, unto the Grantee and its heirs, successors and assigns forever.

And the Grantor, for itself, and its successors, does covenant, promise and agree, to and with the Grantee, its heirs, successors and assigns, that it has not done or suffered to be done, anything whereby the said Property hereby granted are, or may be, in any manner encumbered or charged, except as herein recited; and that the said Property, against all persons lawfully claiming, or to claim the same, by, through or under it, it WILL WARRANT AND DEFEND, subject to: (i) all matters of record; (ii) any and all matters which would be disclosed on a current survey or physical inspection of the Property; (iii) all taxes not yet due and payable; (iv) all building and zoning ordinances, laws, regulations and restrictions by municipal or other governmental authority, and (v) rights of tenants in possession, as tenants only, under unrecorded residential leases as shown on the rent roll delivered by Grantor to Grantee contemporaneously

Cook Park Forest 2

CCFD REVIEWER



herewith (collectively, the “**Permitted Encumbrances**”); however, reference herein to the Permitted Encumbrances shall not be deemed to reimpose same.

Hereby releasing and waiving all rights under and by virtue of the Homestead Exemption Laws of the State of Illinois.


Part of PINS: See **Exhibit A**, attached hereto and incorporated herein.


ADDRESS: See **Exhibit A**, attached hereto and incorporated herein.

Send future real estate tax bills to the Grantee at its address set forth above.

*[signature page follows]*

*[remainder of this page intentionally left blank]*

|  |                   |              |                             |
|--|-------------------|--------------|-----------------------------|
| STATE TAX<br><br>REAL ESTATE TRANSFER TAX<br>DEPARTMENT OF REVENUE | STATE OF ILLINOIS | # 0000025120 | REAL ESTATE<br>TRANSFER TAX |
|  | SEP. 11. 15       |              | 00533.00                    |
|  |                   |              | FP 103037                   |

|  |  |              |                             |
|--|--|--------------|-----------------------------|
| COUNTY TAX<br><br>REVENUE STAMP | COOK COUNTY<br>REAL ESTATE TRANSACTION TAX | # 0000025067 | REAL ESTATE<br>TRANSFER TAX |
|  | SEP. 11. 15                                |              | 00266.50                    |
|  |  |              | FP 103042                   |

IN WITNESS WHEREOF, Grantor has executed this Warranty Deed as of the 28<sup>th</sup> day of July, 2015.

**GRANTOR:**

**BLTREJV3 Chicago LLC**, a Delaware limited liability company

By: 

Name: Paul J. Kuehner

Title: Authorized Signatory

STATE OF Connecticut )  
COUNTY OF Fairfield ) SS.

I, the undersigned, a Notary Public in and for said County, in the State aforesaid, do hereby certify that Paul J. Kuehner, Authorized Signatory for BLTREJV3 Chicago LLC, a Delaware limited liability company, personally known to be to be the same person whose name is subscribed to the foregoing instrument, and in such capacity, appeared before me this day in person and acknowledged that he/she signed and delivered said instrument as his/her own free and voluntary act, and as the free and voluntary act of said limited liability company, for the uses and purposes therein set forth.

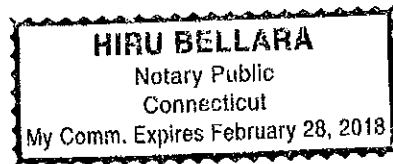
GIVEN under my hand and Notarial seal this 28<sup>th</sup> day of July, 2015.

Hiru Bellara

Notary Public

My Commission Expires:

2/28/2018  
[NOTARIAL SEAL]



No title search was performed on the subject property by the preparer. The preparer of this deed makes no representation as to the status of the title nor property use or any zoning regulations concerning described property herein conveyed nor any matter except the validity of the form of this instrument. Information herein was provided to preparer by Grantors/Grantees and /or their agents; no boundary survey was made at the time of this conveyance.

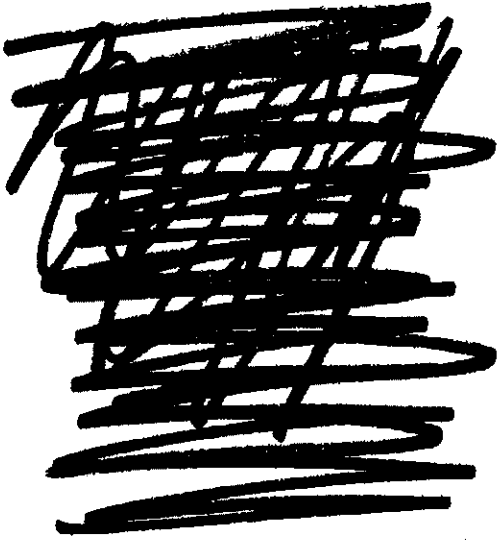


EXHIBIT A







## PROPERTY SCHEDULE

| Count | File Number | Address         | City        | State | Zip   | County |
|-------|-------------|-----------------|-------------|-------|-------|--------|
| 1     | BLT-75      | 208 LEE ST      | PARK FOREST | IL    | 60466 | COOK   |
| 2     | BLT-79      | 212 NASHUA      | PARK FOREST | IL    | 60466 | COOK   |
| 3     | BLT-84      | 220 MIAMI       | PARK FOREST | IL    | 60466 | COOK   |
| 4     | BLT-103     | 277 SOMONAUK ST | PARK FOREST | IL    | 60466 | COOK   |
| 5     | BLT-107     | 303 SHAWNEE ST  | PARK FOREST | IL    | 60466 | COOK   |
| 6     | BLT-109     | 304 SHAWNEE ST  | PARK FOREST | IL    | 60466 | COOK   |
| 7     | BLT-113     | 307 ORCHARD     | PARK FOREST | IL    | 60466 | COOK   |
| 8     | BLT-114     | 307 WINDSOR ST  | PARK FOREST | IL    | 60466 | COOK   |
| 9     | BLT-116     | 308 SHABONA ST  | PARK FOREST | IL    | 60466 | COOK   |

330dolls00cts

420dolls00cts

300dolls00cts

320dolls00cts

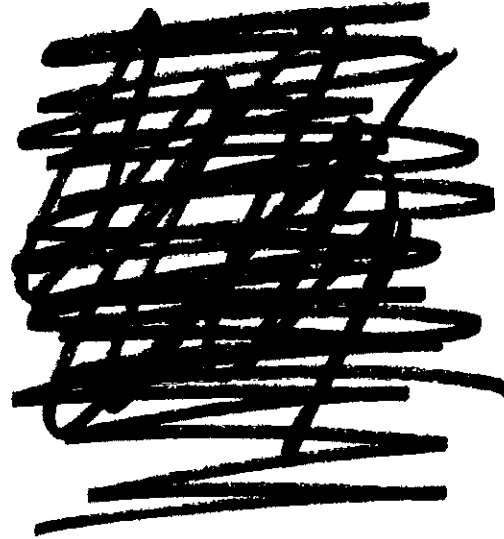
205dolls00cts

280dolls00cts

215dolls00cts

300dolls00cts

320dolls00cts



## LEGAL DESCRIPTIONS

**EXHIBIT A-1**

STREET ADDRESS: 208 LEE ST, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-75

TAX PARCEL ID/APN: 31-24-313-008-0000

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF COOK, STATE OF ILLINOIS, AND IS DESCRIBED AS FOLLOWS: LOT 14 IN BLOCK 29 IN LINCOLNWOOD CENTER, BEING A SUBDIVISION OF PART OF THE SOUTHEAST 1/4 AND PART OF THE SOUTHWEST 1/4 OF SECTION 24, TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO PLAT THEREOF RECORDED JUNE 26, 1958, AS DOCUMENT 17245364 AND FILED IN THE OFFICE OF THE REGISTRAR OF TITLES AS DOCUMENT LR1803326, IN COOK COUNTY, ILLINOIS.

\*\*\*

**EXHIBIT A-2**

STREET ADDRESS: 212 NASHUA, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-79

TAX PARCEL ID/APN: 31-35-416-030-0000

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF COOK, STATE OF ILLINOIS, AND IS DESCRIBED AS FOLLOWS: LOT 9 IN BLOCK 66 IN RE-SUBDIVISION OF BLOCKS 46 AND 65 IN VILLAGE OF PARK FOREST AREA NUMBER 5, BEING A SUBDIVISION OF PART OF THE EAST 1/2 OF SECTION 35 AND THE WEST 1/2 OF SECTION 36, TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO THE PLAT THEREOF RECORDED OF SAID RE-SUBDIVISION FILED FOR RECORD IN THE OFFICE OF THE RECORDER OF COOK COUNTY, ILLINOIS ON JULY 15, 1952 AS DOCUMENT NUMBER 15387755, IN COOK COUNTY, ILLINOIS.

\*\*\*

**EXHIBIT A-3**

STREET ADDRESS: 220 MIAMI, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-84

TAX PARCEL ID/APN: 31-36-312-016-0000

LOT 25 IN BLOCK 54 IN VILLAGE OF PARK FOREST AREA NO. 5, BEING A SUBDIVISION OF PART OF THE EAST 1/2 OF SECTION 35 AND THE WEST 1/2 OF SECTION 36, TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO THE PLAT THEREOF RECORDED AUGUST 3, 1951, AS DOCUMENT 15139014, IN COOK COUNTY, ILLINOIS.

\*\*\*

**EXHIBIT A-4**

STREET ADDRESS: 277 SOMONAUK ST, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-103

TAX PARCEL ID/APN: 31-35-420-006-0000

LOT 6 IN BLOCK 77 IN VILLAGE OF PARK FOREST AREA NO. 8, BEING A SUBDIVISION OF PART OF THE SOUTHEAST 1/4 OF SECTION 35, TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO THE PLAT THEREOF RECORDED IN THE RECORDER'S OFFICE OF COOK COUNTY, ILLINOIS ON SEPTEMBER 30, 1953, AS DOCUMENT 15733496, IN COOK COUNTY, ILLINOIS.

\*\*\*

**EXHIBIT A-5**

STREET ADDRESS: 303 SHAWNEE ST, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-107

TAX PARCEL ID/APN: 31-35-409-007-0000

LOT 14 IN BLOCK 80 IN VILLAGE OF PARK FOREST AREA NUMBER 8, BEING A SUBDIVISION OF PART OF THE SOUTHWEST 1/4 OF SECTION 35, TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO THE PLAT THEREOF RECORDED AS DOCUMENT NUMBER 15733496, IN COOK COUNTY, ILLINOIS.

\*\*\*

**EXHIBIT A-6**

STREET ADDRESS: 304 SHAWNEE ST, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-109

TAX PARCEL ID/APN: 31-35-408-027-0000

LOT 5 IN BLOCK 81 IN VILLAGE OF PARK FOREST AREA NUMBER 8, BEING A SUBDIVISION OF PART OF THE SOUTHEAST 1/4 OF SECTION 35, TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN ACCORDING TO THE PLAT THEREOF RECORDED SEPTEMBER 30, 1953 AS DOCUMENT NUMBER 15733496, IN COOK COUNTY, ILLINOIS.

\*\*\*



**EXHIBIT A-7**

STREET ADDRESS: 307 ORCHARD, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-113

TAX PARCEL ID/APN: 31-36-406-021-0000

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF COOK, STATE OF ILLINOIS, AND IS DESCRIBED AS FOLLOWS: LOT 36 IN BLOCK 22 IN VILLAGE OF PARK FOREST AREA NO. 3, BEING A SUBDIVISION IN SECTION 36, TOWNSHIP 35 NORTH, RANGE 13 EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO THE PLAT THEREOF RECORDED IN THE RECORDER'S OFFICE OF COOK COUNTY, ILLINOIS ON OCTOBER 31, 1950, AS DOCUMENT NUMBER 14940342, IN COOK COUNTY, ILLINOIS.

\*\*\*

**EXHIBIT A-8**

STREET ADDRESS: 307 WINDSOR ST, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-114

TAX PARCEL ID/APN: 31-35-201-008-0000

LOT 4 IN BLOCK 5 IN THE VILLAGE OF PARK FOREST WESTWOOD ADDITION, BEING A SUBDIVISION OF PART OF THE SOUTHEAST 1/4 OF SECTION 26, AND THAT PART OF THE NORTHEAST 1/4 OF SECTION 35, ALL IN TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

\*\*\*

**EXHIBIT A-9**

STREET ADDRESS: 308 SHABBONA ST, PARK FOREST, IL 60466

COUNTY: COOK

CLIENT CODE: BLT-116

TAX PARCEL ID/APN: 31-35-212-066-0000

THE LAND REFERRED TO HEREIN BELOW IS SITUATED IN THE COUNTY OF COOK, STATE OF ILLINOIS, AND IS DESCRIBED AS FOLLOWS: LOT 33 IN BLOCK 94 IN VILLAGE OF PARK FOREST AREA NUMBER 4, BEING A SUBDIVISION OF PART OF THE EAST 1/2 OF SECTION 35 AND THE WEST 1/2 OF SECTION 36, TOWNSHIP 35 NORTH, RANGE 13, EAST OF THE THIRD PRINCIPAL MERIDIAN, IN COOK COUNTY, ILLINOIS.

\*\*\*

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**DIANE SHEARS  
PLAINTIFF**

vs.

No. 1:22-cv-2099  
Judge LaShonda A. Hunt

**AMERICAN PUBLIC DEFENSE, INC.,  
and LEWIS BROWN  
DEFENDANTS**

**FINAL DEFAULT JUDGMENT ORDER**

Before this Court is Plaintiff's Motion for Default Judgment ("Motion") against Defendant Lewis Brown ("Defendant"), the matter having come for hearing on August 1, 2023, after notice to Mr. Brown. Mr. Brown did not appear. After reviewing all the pleadings and Plaintiff's Motion and all exhibits to Plaintiff's Motion, this Court finds and orders as follows:

1. Taking the factual allegations in Plaintiff's Complaint as true, as is appropriate on a motion for default judgment, Plaintiff has presented evidence which establishes a basis for Plaintiff's claims relating to violations of the minimum wage and overtime provisions of the Fair Labor Standards Act, 29 U.S.C. § 201 *et seq.* (the "FLSA"), and the Illinois Minimum Wage Law, 820 ILCS 105/1, *et seq.* ("IMWL").

2. Defendant Lewis Brown is an individual and resident of Illinois and the operating employer of domestic, for-profit corporation, American Public Defense, Inc.

3. Defendant Lewis Brown employed Plaintiff as a Security Officer from July of 2021 until December of 2021.



4. Defendant determined the hours worked by Plaintiff, the manner in which she performed her job duties, and her schedule.

5. Defendant did not pay Plaintiff an overtime premium for hours worked over 40 each week.

6. Defendant also regularly fined Plaintiff for various offenses, sometimes deducting so much money from Plaintiff's paycheck that her constructive hourly rate fell below the applicable minimum wage.

7. Defendant failed to pay Plaintiff overtime, as well as proper minimum wages under the IMWL.

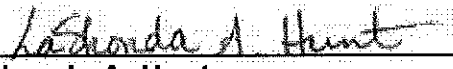
8. Plaintiff's unpaid wages equal \$8,527.69. Under the FLSA, Plaintiff is also entitled to an equal amount, \$8,527.69, as liquidated damages. Under the IMWL, Plaintiff is also entitled to \$8,874.31 in statutory premiums, as well as \$25,583.06 in statutory treble damages. Therefore, Defendant Lewis Brown is liable to Plaintiff for a total of \$51,212.75.

9. Furthermore, because Defendant Lewis Brown failed to pay Plaintiff overtime and appropriate minimum wages, as of the date of this Order, Plaintiff had accrued \$6,239.54 in reasonable attorney fees and costs. Under the FLSA, Plaintiff is entitled to an award of attorney fees and costs for having pursued her case and having been awarded damages.

10. The total amount of the judgment due to Plaintiff from Defendant Lewis Brown is \$57,452.29.

**IT IS SO ORDERED.**

DATED: August 15, 2023

  
\_\_\_\_\_  
**LaShonda A. Hunt**  
**United States District Judge**